

### III. REMARKS

Claims 1, 4-6, 9-14 and 16-20 are amended. Claims 24-36 are new.

Claims 1, 6, and 11 are definite under 35 U.S.C. 112, first paragraph. One example of the "different data" recited in claims 1, 6, and 11 is the "authentication dialog box" disclosed in the specification at page 14, line 26 through page 15, line 2.

Claims 1, 2, 4-7, 9-13 and 15-23 are patentable under 35 U.S.C. 102(e) over Crist et al., U.S. Patent No. 6,879,940 ("Crist"). Claim 1 recites that the module being configured to receive and process a first data from the remote network and send a different data to the local network based on the first data received from the remote network. This feature is not disclosed or suggested in Crist.

Crist discloses a plurality of remote client workstations (30) each having a remote access line (31). Each access line (31) connects its corresponding workstation(s) (30) to the client's local workstation (32) (Col. 6, L. 57-66; Fig. 3). The client develops a test program (Col. 4, L. 57-60) and transmits the test program from the remote workstation (30) to the local workstation (32) (Col. 6, L. 1-18). The host schedules particular times on the test system (34) for particular single clients, who may then operate the test system (34) (Col. 7, L. 12-14). The test program is then used to run the test system (34).

In Crist the data transferred between the remote workstations (30) (e.g. the remote network) and the local workstations (32) (e.g. the intermediate network) is the same data that is transferred between the local workstations (32) and the test system (34) (e.g. the local network). In Crist it is the

client's test program for running the test system that is transferred. This is not what is claimed in claim 1. Claim 1 recites that the module being configured to receive and process a first data from the remote network and send a different data to the local network based on the first data received from the remote network. Furthermore, even if the host (36) is considered part of the local network or the intermediate network, controlling access to the test system (e.g. screening clients through a security system and scheduling access times) is not the transfer of different data as claimed by Applicant.

Claim 1 further recites that the module being configured to transmit a second data from the intermediate network to the remote network where the second data is related to a predetermined condition of equipment identified by the module. Crist simply does not disclose or suggest this feature. Thus, claim 1 is patentable over Crist.

Claim 6 recites a module located within the intermediate network, the module being configured to receive and process data from at least one of the plurality of users of the remote network and send a different data to at least one of the plurality of equipment of the local network based on the data received from the remote network. Crist does not disclose or suggest this feature for the reasons described above with respect to claim 1. Claim 6 is patentable at least for this reason.

Further, claim 6 recites the module being further configured to allow one of the plurality of users to select at least one equipment diagnostic monitor system from a plurality of equipment diagnostic monitoring systems. Crist does not disclose or suggest this feature. In Crist, the clients of the remote workstations (30) can remotely operate only one test system (34)

through a corresponding local workstation (32) (See Fig.3). The clients in Crist have to arrange for a selected time during which the host computer (36) will allow the clients access to the test system (Col. 6, L. 7-10). When a particular client in Crist has scheduled time on the test system (34) all other clients are prevented from accessing the test system (34) (Col. 7, L. 4-6). Nowhere does Crist disclose or suggest allowing one of the plurality of users to select at least one equipment diagnostic monitor system from a plurality of equipment diagnostic monitoring systems. Thus, claim 6 is patentable for this additional reason.

Claim 11 is patentable for substantially the same reasons described above with respect to claims 1 and 6. Claims 2, 4, 5, 7, 9, 10, 12, 13 and 15-23 are patentable at least by reason of their respective dependencies.

Claim 4 recites that the module exchanges data with an equipment diagnostic monitor system located within the intermediate network and that the equipment diagnostic monitor system has the function of monitoring at least one activity of at least one tool residing within the local network. These features are not disclosed in Crist.

The Examiner refers to text of column 5, lines 34-37 in making the rejection of claim 4. Column 5, lines 34-37 recite that "the test program must at some point in time be transferred to the local workstation (32, 7) in order to run the test system (34, 8) from the local workstation (32, 7)" and that the test system (8) is connected to the host's network (10) (LAN). The "test program" is located in the local workstation (32) (which the Examiner equates to Applicant's "intermediate network"). The test system (34, 8) is part of the "local network" as indicated

by the Examiner at page 3, item 7, lines 5-8 of the Office Action. Therefore, the test system (34, 8) of Crist is not "an equipment diagnostic monitor system located within the intermediate network" as recited by Applicant.

Furthermore, the test system (34, 8) of Crist does not "monitor" a "tool". The test system (8) is itself "a machine or machines and any associated ancillary equipment used in semiconductor circuit testing" (Col. 4, L. 27-29). Thus, the test system (34, 8) is not an equipment diagnostic monitor system as recited in claim 4 for this additional reason. The test program of Crist is also not an equipment diagnostic monitor system. The test program merely operates the test system (34, 8) (Col. 5, L. 34-36). Therefore, claim 4 is patentable.

Claim 5 recites that the equipment diagnostic monitor system collects and analyzes data from tests performed on the at least one tool. Crist does not disclose or suggest this feature. The Examiner again cites to the text of column 5, lines 34-37 in support of the rejection. However, as noted above, column 5, lines 34-37 merely disclose that the test program is transferred to the local workstation (32, 7) in order to run the test system (8). The Examiner also cites to column 4, lines 15-21. Column 4, lines 15-21 recites that "fabless firms may desire the ability to remotely monitor, analyze, and run integrated circuit test programs during the design, debug and production phases of making a new integrated circuit". Nowhere in these cited passages, nor anywhere else in Crist is it disclosed or suggested that an "equipment diagnostic monitor system collects and analyzes data from tests performed on the at least tool". Thus, claim 5 is patentable. This argument applies equally to claims 9 and 15.

Claim 12 recites a security module located within the intermediate network, through which data transferred between the local network and the remote network passes. This feature is not disclosed in Crist. Crist discloses that "the data and test programs for each of the individual clients are typically separated by a series of firewalls (33) (Col. 7, L. 1-3). Nowhere is it disclosed or suggested that the firewalls (33) are located in the local workstations (32) (i.e. the Examiner's intermediate network). Rather figure 3 of Crist clearly show the firewalls (33) being separated from the local workstations (32). Thus, the firewall (33) of Crist is not a security module located within the intermediate network as recited in claim 12. Therefore, claim 12 is patentable.

Claim 17 recites that the user on the remote network sends a suggestion regarding an operation of the at least one item being monitored to an entity managing the at least one item on the local network. This feature is not disclosed or suggested in Crist. The Examiner cites to column 6, lines 14-38 in support of this rejection. Column 6, lines 14-38 discloses that the client accessing the test system (8) may request technical assistance from the host and nothing more. There is no disclosure whatsoever that the client send a "suggestion regarding an operation of the at least one item being monitored" as recited in claim 17. Thus claim 17 is patentable.

Claim 18 recites that the equipment diagnostic monitor system sends an alert to a predetermined entity when an analysis of data received from the at least one item indicates that the at least one item is operating outside of a predetermined performance range. Nowhere is this feature suggested or disclosed in Crist. The Examiner cites to column 4, lines 15-21 of Crist in support

of this rejection. This cited passage of Crist merely recites "in order to speed development and reduce cost in semiconductor manufacturing, companies such as fabless firms may desire the ability to remotely monitor (such as their own physical facilities), analyze, and run integrated circuit test programs during the design debug and production phases of making a new integrated circuit". Thus, claim 18 is patentable.

Claim 19 recites a remote control proxy server in the intermediate network that is between the local network and the remote network that prevents direct IP routing of a device in the local network that is being accessed by the remote network. Nowhere is this disclosed or suggested in Crist. The Examiner refers to the host network (36) of Crist as being the remote control proxy server recited by Applicant. However, the host network (36) is clearly not in the local workstation (32) (i.e. the Examiner's intermediate network) nor does Crist disclose or suggest that the host network (36) "prevents direct IP routing of a device in the local network that is being accessed by the remote network". Therefore, claim 19 is patentable.

Claim 21 recites that the intermediate network further comprises an equipment diagnostic monitor system that monitors and analyzes the semiconductor tool. Claim 20 is patentable over Crist for reasons similar to those described above with respect to claim 4.

Claim 22 recites that the equipment diagnostic monitor system controls tests performed by software within the semiconductor tool, saves data from the tests and sends out alerts to a remote user via the remote network when the semiconductor tool is operating outside a predetermined performance range. Claim 22 is patentable over Crist for reasons similar to those described above with respect to claim 18. Further, in Crist the software

(i.e. test program) for controlling the test system (34) is located in the local workstation (32) not the test system (34).

Claims 3, 8 and 14 are patentable under 35 U.S.C. 103(a) over Crist in view of Reid et al., U.S. Patent No. 6,182,226 ("Reid"). It is submitted that because Crist does not disclose all the features of independent claims 1, 6 and 11 the combination of Crist and Reid cannot as well. Thus, claims 3, 8 and 14 are patentable at least by reason of their respective dependencies.

Further, claim 3 recites that the module hides the IP addresses of the remote network and the local network from each other. It would not be obvious to one skilled in the art to combine Crist with Reid to achieve what is claimed by Applicant. The firewall (33) of Crist is located between what the Examiner is calling the local network (i.e. the camera 11 and the test system 34; Fig. 3) and the intermediate network (i.e. the local workstations 32; Fig. 3). The local workstations (32) of Crist are located at the host's facility (Col. 6, L. 15-18) and are the first workstations the data flow from the client encounters in operating the test system (34). The firewall (33) is located between the local workstations (32) and the host network (36) and also the test system (34). The host network (36) and test system (34) are also located at the host's facilities (Col. 6, L. 15-38). Because the firewall (33) is located down stream from the workstations (32) and because the host has access to the workstations (32) (Col. 6, L. 28-31) the host also has access to the client IP address via the local workstations (32). Thus, the combination of Crist and Reid does not disclose or suggest hiding the IP addresses of the remote network and the local network from each other as recited in claim 3. Claims 8 and 14 are patentable for reasons similar to those described above with respect to claim 3.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for a one-month extension of time, fees for one additional independent claim and twelve additional dependent claims and for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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